Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review of language in 73.182, 73.186 and 73.189 among others, with respect to AM station antenna efficiency. Currently each Class of AM station has annotated in the Rules a "minimum efficiency" of antenna power measured at a distance of 1 kilometer from the AM radiator. TTS proposes that these Rules be amended to instead specify a Community of License Coverage requirement – just like that of FM stations – and permit AM stations to operate with less-than-efficient radiating systems.

While the standardization of AM antenna systems is recognized, the reality in the 21st century is that the AM service as a whole is struggling to remain in existence. Regulations like these efficiency minimums restrict AM licensees from keeping a viable technically permitted operation. With real estate limits now in place for AM station owners, sufficient land area to meet current efficiency requirements may be impossible. Dozens or hundreds of AM stations are now, and have been for years, operating on Special Temporary Authority (STA's) because having a licensable AM radiator is not possible or practical. AM licensees should be permitted to build any AM radiator that is possible, without regard to meeting minimum field efficiency values. Instead, AM licensees should be permitted to demonstrate that they provide the requisite Community of License contour over the community, regardless of the inefficient method used by the radiating element.

A thorough review of this technical restriction is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services